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January 24, 2019

VIA ECF

Judge John G. Koeltl
Daniel Patrick Moynihan
United States Courthouse
500 Pearl St.
New York, NY 10007-1312

Re: *Eastern Profit Corporation Limited v. Strategic Vision US LLC*,
Civil Action No. 18-CV-2185.

Dear Judge Koeltl,

Plaintiff Eastern Profit Corporation Limited (“Eastern”) hereby supplements its Rule 37.2 Request for a conference to update the Court concerning additional discovery items in dispute.

On January 22, 2019, Strategic Vision (“SV”) served Eastern with Responses and Objections to Eastern’s Second Set of Requests for Production of Documents. Eastern believes several of SV’s responses and objections to Eastern’s Second Set of Requests for Production of Documents are improper. Specifically, the new items in dispute are SV’s Responses and Objections to Requests for Production numbered 29, 30, 31, 32, 36, 37, 38, and 39.

On or about January 23, 2019, SV served Eastern with Supplemental Responses and Objections to Eastern’s First Set of Requests for Production and Interrogatories. While clarifying to a degree, and disposing of the parties’ dispute concerning Eastern’s interrogatories numbered 2 and 4, SV’s supplemental responses do not resolve the parties’ discovery dispute. Specifically, interrogatories numbered 3, 5, 7, 10, 11, and 12 and requests for production 1, 2, 3, and 17 remain in dispute.

On January 24, 2019, counsel for Eastern and SV met and conferred telephonically concerning these discovery items, and endeavored in good faith to resolve this discovery dispute yet again. While that effort was ultimately unsuccessful, the parties have significantly narrowed the scope of this dispute down to a few core issues and questions for the Court.

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In the interests of economy, Eastern respectfully seeks to discuss these additional items at the Local Rule 37.2 Conference scheduled for January 28, 2019.

Eastern Profit Corporation Limited
By its Attorneys

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CERTIFICATE OF SERVICE

I hereby certify that this document will be served by U.S. mail and email on all counsel of record on January 24, 2019.

/s/ Zachary Grendi
Zachary Grendi, Esq.